

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Welspun Litigation

Consolidated Case No. 16-cv-6792
(RJS)

ECF Case

Class Action

**DECLARATION OF ROBERT B. CAREY IN SUPPORT OF THE ABBOTT
AND AASGARD PLAINTIFFS' REPLY IN REPLY IN SUPPORT OF THE
JOINT APPLICATION OF HAGENS BERMAN AND STECKLER GRESHAM
COCHRAN LLC TO BE APPOINTED INTERIM CO-LEAD COUNSEL**

I, ROBERT B. CAREY, declare as follows:

1. Attached as Exhibit A is my firm's travel policy.
2. In previous cases where I have been named lead or co-lead counsel, we have not allowed attorneys to submit claims for reimbursement when they stay at luxury hotels, such as the Four Seasons, hire private car services, or have meals when they work late or on the weekends. First class air travel is only permitted when flights are excessively long or the difference between a full fare coach ticket and a first class ticket is negligible.
3. Based on discussions with attorneys at Bursor & Fisher, it appeared to me that the *Brower* case was being managed by Tim Fisher, who is based in Walnut Creek, California. I have also dealt directly with Joel D. Smith, and was referred to him by Mr. Fisher when Mr. Fisher was unavailable. Mr. Smith is also based in Walnut Creek, California.
4. My firm and McCune Wright LLP were co-lead counsel in *In re Hyundai and Kia Fuel Economy Litig.*, MDL 13-2424 (C.D. Cal.), and negotiated \$400 million in benefits for the class, \$97 million of which was paid in monetary benefits to hundreds of thousands of class members, including lump-sum payments averaging \$353 for Hyundai drivers, \$667 for Kia drivers, and as high as \$715 for

Hyundai owners and \$1420 for Kia owners. Under the terms negotiated by Hagens Berman and McCune Wright, payments were the same regardless of the total number of claims and in addition to any award of attorneys' fees.

5. For its work, Hagens Berman and McCune Wright were awarded \$5.55 million in fees and \$343,550 in costs.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 28th day of December 2016, at Phoenix, Arizona.

s/ Robert B. Carey
ROBERT B. CAREY

CERTIFICATE OF SERVICE

I hereby certify that on December 28, 2016, I electronically filed the foregoing document using the CM/ECF system which will send notification of such filing to the e-mail addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List, and I hereby certify that I have mailed a paper copy of the foregoing document via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List generated by the CM/ECF system.

s/ Robert B. Carey
ROBERT B. CAREY